



July 13, 2020

M. Claude Doucet
Secretary General
Canadian Radio-Television Telecommunications Commission
Place des Chaudières
Gatineau, QC

M. Doucet:

**RE: Canadian Broadcasting Corporation
Application for Licence Renewal
CRTC Application No. 2019-0282-5**

1. I am the Founder and President of Electronic Earth, a not-for-profit corporation whose mandate is to connect and support new and emerging Canadian content producers in the development and delivery of Canadian film, television and web-programming content to wider Canadian and international audiences. A sample of the projects that Electronic Earth has supported can be found at our website: electronicearth.ca
2. We are writing now on behalf of our members to intervene in the present application filed by Canadian Broadcasting Corporation ("CBC") to renew its television licences. Having reviewed CBC's Public Financial Summary recently filed in support of its application, Electronic Earth **proposes changes to the Corporation's conditions of licence.**
3. We understand from the Commission's initial Notice of Consultation that it will be considering the issue of CBC's role in fostering original Canadian audio-visual content, with a particular focus on what support(s) it offers to new and emerging talent.¹ We believe that CBC should be required to reinvest in original Canadian programming content, rather than put more money into non-programming initiatives, as CBC's Public Financial Summary appears to suggest.

Proposed Reallocation of Programming Dollars

4. It is our understanding from reading the Supplementary Brief filed by CBC that it is seeking relief from certain terms of licence requiring a minimum amount of programming to be broadcast over its traditional platforms, which it then intends to make up for on its digital properties such as Gem.² While we take no position on whether CBC's digital offerings should be included in how the Commission measures CBC's programming, we do think CBC should be required to reinvest at least a portion of the financial savings from that plan back into additional new and emerging Canadian audio-visual content creators.
5. We understand from the Notice of Consultation that CBC has declared in its strategic plan for the coming licence term that it "will ensure Canada and Canadian creators are seen and heard around the world".³ In fact, in its Supplementary Brief, CBC outlines its role in the development of Canadian content: "CBC/Radio-Canada highly values Canada's independent producers as partners; together we are the engine for the country's creative sector".⁴ However, what can be seen from the additional

¹ CRTC NoC 2019-379 at para. 21, Qs 8 and 11.

² CBC Supplementary Brief at paras. 20 and 21.

³ CRTC NoC 2019-379 at para. 10.

⁴ CBC Supplementary Brief at para. 22.

financial information filed by CBC is that it intends to take money away from audio-visual production, and reinvest it into primarily alpha-numeric non-broadcast material.

6. In reviewing the “Digital” elements of the Public Financial Summary, we note CBC intends to increase spending on Gem and similar platforms until at least 2023 with the trend likely to continue through the remainder of the licence period. What we also see is that increase matches almost dollar for dollar the corresponding increase in digital advertising revenue over the same period.
7. However, in reviewing the “Conventional” elements, primarily television, we note CBC proposes to decrease spending on annual television programming. Comparing the 2020-2021 fiscal year actual spend to the proposed budget for the 2022-2023 year, we see CBC intends to reduce its television programming expense by \$16 million. This reduction in spending outpaces its loss in advertising and subscription revenue by a factor of two, and comes despite the fact the Government Appropriation itself is projected to be \$22 million higher than it is today.
8. The additional \$8 million cut from television programming that exceeds any corresponding losses and the \$22 million increase in government funds represent together a net gain of \$30 million in available funds by the 2022-2023 year. From that \$30 million amount CBC proposes to reinvest only \$6.5 million on its digital platforms such as Gem and its French-language counterpart.
9. This information illustrates that CBC expects to have \$23.5 million *more* in available funding by the 2022-2023 year than it does today. So the question is, “What does CBC intend to do with the money it is no longer investing in programming?”. The answer appears to lie in the line titled “Websites, Curio and Other”.
10. What we see on that line is that CBC intends to spend \$29 million more on “primarily CBC.ca and Radio-Canada.ca” in the 2022-2023 year than it does today.⁵ CBC acknowledges these services are “non-programming”. Electronic Earth is of the view that CBC should *not* be granted the requested relief from its condition of licence unless it intends to reinvest in new and emerging talent instead of increasing funding for non-programming activities as it proposes.
11. This intervention seeks to explain the hurdles faced by our members in reaching larger audiences, and to demonstrate why CBC should be required to meaningfully reinvest a portion of the excess funds now slated for alpha-numeric content into new and emerging Canadian talent in exchange for being relieved of its current conditions of licence. We propose a plan under which CBC can play an industry leading role in truly developing Canadian audio-visual content makers, as is its own stated objective.

Hurdles for New and Emerging Talent

12. Our members, like many individuals trying to break into a new industry, face a number of hurdles to success: primarily a lack of access to financing; and a lack of access to exposure. The all-too-familiar Catch 22 is as present in the world of film production as it is elsewhere, namely that without money, there are limited opportunities to produce a marketable product, and without an established track-record of successful products, there are few people who are willing to give you money.
13. We understand that CBC offers funding for new and emerging filmmakers through initiatives such as CBC Films; Electronic Earth applauds these initiatives. However, CBC’s own Frequently Asked Questions section on its website regarding funding for Canadian films acknowledges that its funding model in many instances locks out truly new and emerging talent:

⁵ CBC Public Financial Summary, Note 4.



**Why does the filmmaker have to have had a film in a recognized festival?
You're shutting out the very groups you say you want to support.**

CBC Films mandate is aimed at supporting creators who already have some experience and recognition. *First time filmmakers are encouraged to investigate other sources of funding* set out in our list of funding and production resources at the bottom of these FAQs [emphasis added].⁶

As of the date of writing, the link to “other sources of funding” was dead.

14. As shown in the attached ‘Schedule A’, many sources of funding available to filmmakers either require a producer or director to have a previous project selected by a recognized film festival, have had a project broadcasted, have a significant amount of funding to already be in place (sometimes up to 90%), have an advance distribution commitment to already be in place, and/or have an existing agreement with a recognized broadcaster to have been negotiated. These requirements are often unattainable for new and emerging filmmakers.
15. If CBC intends to be the engine of Canada’s creative sector as it states in its application, it should be moving to eliminate these hurdles for first time filmmakers rather than perpetuate them. CBC is uniquely positioned to do so with its Gem Platform.

Proposal for Overcoming the Hurdles

16. Electronic Earth proposes a two-prong requirement that should be imposed on CBC in exchange for being relieved of its conditions of licence, as it is requesting, namely:
 - 1) that a portion of the financial savings which CBC proposes to redirect away from programming into non-programming activities should be dedicated to funding truly new and emerging talent; and
 - 2) that CBC should be required to provide a space on its digital platform where the work of new and emerging creators can be showcased to parties looking for projects to develop.

Funding

17. During the COVID-19 pandemic shutdown, CBC established the *CBC Creative Relief Fund* and granted over \$2 million in support of new projects. The eligibility requirements to apply to this fund were minimal: an applicant only needed a single credit, or to be paired with an established producer.⁷ It would seem from this program that CBC acknowledges that locating and developing interesting new talent is not actually contingent on having funding lined up in advance, a significant body of work behind you, a distribution deal already in place or a broadcaster already on board. **That recognition should not be limited to times of crisis, since the funding/experience barriers to new talent are ongoing.**
18. As a result, we propose that the Commission impose the following conditions of licence on CBC:

⁶ <https://www.cbc.ca/films/faq/> (as of June 24, 2020).

⁷ <https://www.cbc.ca/mediacentre/press-release/canadas-public-broadcaster-launches-the-cbc-creative-relief-fund> (as of June 24, 2020).

- 1) That CBC be required to dedicate at least 50% of the money it intends to redirect into non-programming activities, or \$15 million by the end of fiscal year 2023, and an additional \$5 million per year for the remainder of the licence term, to a program dedicated to new and emerging talent exclusively; and
- 2) That the eligibility for this program be established as follows:
 - a) the applicant must be Canadian or a permanent resident of Canada;
 - b) the applicant must not have received more than a lifetime cumulative amount of funding from any source for programming content in excess of \$125,000.00;
 - c) the applicant must not have had a project accepted to a tier 2 or higher film festival and/or been broadcast by a television or streaming content broadcaster; and
 - d) the applicant must not have produced a film that has had theatrical release and/or theatrical distribution in any territory.

19. We think such a program with minimal barriers to access for truly new and emerging audio-visual content creators would serve to advance CBC's self-declared role in the Canadian creative content industry.
20. To ensure the ongoing vibrancy of Canada's film, television and digital production industry, we propose that a similar condition be imposed in subsequent licence terms.

Exposure

21. Furthermore, it is open to CBC to offer a space on its Gem platform where new and emerging filmmakers and content creators can connect with individuals or other organizations who themselves are looking to fund unique projects. This online space would be much like the Catalogue of Canadian Instrumental Music, the merits of which the Commission praised when it was being developed:



The Commission considers that the proposed catalogue will provide a central source for Canadian instrumental music and artists. The catalogue will also be a valuable research tool for radio licencees considering the introduction or addition of instrumental musical selections to their musical rotations.⁸

22. At present, most emerging artists self-publish on sites such as YouTube and Vimeo. On those sites, individuals or other organizations looking for new and exciting projects must navigate through millions of pieces of content that have been posted for any number of reasons, with no real way to know which creators may be seeking development opportunities. Similar to the catalogue, a "Gem Incubator Space" would serve as a central location where new and emerging filmmakers and those seeking out projects could connect. Having the incubator offered on a CBC platform would provide the much-needed exposure and legitimacy to these filmmakers that is presently lacking.
23. Furthermore, CBC would be in a position to promote the Incubator Site both on its traditional and digital platforms. Such a space would be perfectly in keeping with CBC's self-declared role as the "engine of Canada's creative sector". And it also would be a fair trade for CBC's proposed amendment to one of its conditions of licence.
24. We understand from CBC's Supplementary Brief that it is asking to reduce the amount of required programming on its traditional platforms, and to be permitted to lean on its digital platforms to satisfy

⁸ CRTC Decision No. 2005-254 at para. 19.

its regulatory requirements.⁹ We agree with CBC that how Canadians consume content is changing, and that digital platforms are certainly growing in prominence (one need not look further than to the success of Netflix and AppleTV in the most recent awards season!).

25. We also understand that the Commission typically does not like granting these kinds of changes unless the licensee offers something in return to benefit the system more broadly. As a result, we feel it is entirely appropriate that if the Commission is prepared to grant CBC's request to include its digital programming toward its regulatory obligations that the Commission also impose a condition of licence requiring CBC to offer up a part of that platform for the development of new and emerging Canadian content producers, rather than redirect that money into non-programming activities as it proposes.
26. As a result, in addition to the funding condition above, we propose the Commission impose the following conditions of licence on CBC:
 - 1) That CBC be obligated to create a channel on its Gem platform for the purpose of providing space to new and emerging Canadian content providers; and
 - 2) That the Commission declare its expectation that the channel be promoted on CBC's platforms (both traditional and non-traditional) in keeping with CBC's self-declared role in developing Canadian content.
27. Together, these proposed conditions of licence would greatly assist new and emerging Canadian content creators in both getting their projects off the ground, and connecting with individuals who may be able to bring their projects to the next level. This outcome can be achieved at very little cost to CBC, all the while in keeping with its mandate and role in developing Canadian culture as the engine for the country's creative sector.
28. We appreciate the opportunity to offer our comments. **We request to appear at the public hearing** in order to further discuss how CBC can truly help new and emerging Canadian content producers and filmmakers.



Sean Young
Founder and President

⁹ CBC Supplementary Brief at para. 20.

Schedule 'A'

Funding barriers to truly new and emerging filmmakers and content-producers.

	Requires Funding in Place	Distribution/Broadcast Agreement Needed	Previous Project Credits Needed	Previous Work Advance Approval
CBC Creative Relief Fund <i>*no longer available, COVID-19 emergency relief</i>	No	No	1 any above line credit in any project No festival showcase or broadcast requirement	No
CBC Breaking Barriers Film Fund¹	Yes – 80 to 90% Available: 10% to 20%	No	1 above line feature length film credit shown at a recognized film festival	No
CBC Films²	No	No	1 director credit on a feature film showed at recognized festival or 3 director credits on a broadcasted episodic series or 1 director credit on a short film showed at a tier A international festival	No
Ontario Creates³	Yes – 70% Available: 30%	No	1 producer credit on a feature length film that had theatrical release or 1 television movie that was broadcast or 1 series that was broadcast	No
Telefilm Canada Talent to Watch⁴	No	No	1 above line short film credit featured at a tier A international film festival or 1 recommendation by a partner educational institution (each institution may only put forward one application)	Automatic funding approval to filmmaker who wins an award at a recognized festival
Telus Fund Production Fund⁵	Yes – 5% and “.. significant contribution from the Canadian production sector”	Yes	No	No
Canada Media Fund Independent Production Fund⁶ (CMF & IPF)	No	No	“Must have previous credits as either producer or writer on scripted episodic or short form content.”	No

1 <https://www.cbc.ca/mediacentre/press-release/cbc-launches-cbc-breaking-barriers-film-fund-in-support-of-underrepresented>

2 <https://www.cbc.ca/films/guidelines/> and <https://www.cbc.ca/films/faq/>

3 <http://www.ontariocreates.ca/Assets/Industry+Initiatives/English/Content+and+Marketing/Film+Fund/Film+Fund+Production+Guidelines.pdf>

4 <https://telefilm.ca/en/financing/talent-to-watch>

5 <https://telusfund.ca/apply-production/>

6 <https://www.cmf-fmc.ca/getattachment/ae9a9716-0c53-4404-ae95-44b0e75aca47/attachment.aspx>

**CBC LICENCE RENEWAL
CRTC APPLICATION No. 2019-0282-5**

***ELECTRONIC EARTH INTERVENTION
FOOTNOTE SOURCE MATERIAL***

This document gathers together the footnote references used in the CBC Licence Renewal intervention assembled by Electronic Earth and electronically filed on behalf of its Members with the Canadian Radio-Television Telecommunications Commission by Sean Young, President and Founder on July 13th, 2020.

1. CRTC NoC 2019-379, para. 21, Qs 8 and 11.

21. In light of the above, the Commission invites responses to the following questions:

Q8. What, if any, improvements could be made to ensure that the Corporation creates and broadcasts high-quality original Canadian productions?

Q11. Does the Corporation provide adequate support to ensure diversity in key production roles on all of its platforms and services? To what extent is this diversity reflected in its programming choices? What could the Corporation do to increase and improve such diversity in production?

Full Document

<https://crtc.gc.ca/eng/archive/2019/2019-379.htm>

2. CBC Supplementary Brief at paras. 20 and 21.

20. We (CBC) are proposing the following commitments:

French Services

- a) **PNI programming** – an expectation of 8 hours per week of PNI programming in total (i.e., total exhibition hours for conventional television and our digital platforms), and a condition of licence setting a minimum of 6 hours per week on the ICI TÉLÉ;
- b) **Children’s and youth programming** – a condition of licence of 15 hours of children’s programming per week on the ICI TÉLÉ, and an expectation of 110 hours of original children’s and youth programming in total (i.e., total exhibition hours for conventional television and our digital platforms), with a condition of licence setting a minimum of eighty 80 hours of original children’s and youth programming per broadcast year on the ICI TÉLÉ; and
- c) **Local programming** – an expectation of 5.5 hours per week of local programming in total (i.e., total exhibition hours for conventional television and our digital platforms); and a condition of licence setting a minimum of 5 hours of local programming on the ICI TÉLÉ stations.

English Services

- a) **PNI programming** – an expectation of 10 hours per week of PNI programming in total (i.e., total exhibition hours for conventional television and our digital platforms), and a condition of licence setting a minimum 7 hours per week on CBC Television;
- b) **Children’s and youth programming** – a condition of licence of 15 hours of children’s programming per week on CBC Television; and an expectation of 80 hours of original children’s and youth programming in total (i.e., total exhibition hours for conventional television and our digital platforms), with a condition of licence setting a minimum of 40 hours of original children’s and youth programming per broadcast year on CBC Television; and
- c) **Local programming** – an expectation of 14.5 per week of local programming in metropolitan markets in total, and 7.5 hours per week of local programming in non-metropolitan markets per week in total (i.e., total exhibition hours for conventional television and our digital platforms), with a condition of licence setting a minimum of 12 hours per week on CBC Television stations in metropolitan markets, and 5 hours per week on CBC Television stations in non-metropolitan markets.

21. As indicated above, we would satisfy the expectation for a particular genre of content by means of traditional *and* digital platforms, but be subject to the *specified floors* on traditional platforms. This proposal will allow us the flexibility to serve Canadians on whichever platform they choose to access our programming; in short, to put our *audiences first* in our programming strategies.

Full Document:

https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?AppNo=201902825&_ga=2.88344349.702944990.1594532625-2125534837.1594240961

3. CRTC NoC 2019-379 at para. 10.

10. On 22 May 2019, the Corporation issued *Your Stories, Taken to Heart*, its new three-year strategic plan. At that time, the Corporation noted that it is driven by a desire to put audiences, individuals and communities first in its programming decisions with a view to building lifelong relationships with its viewers, while strengthening its brand and growing social cohesion. To this end, the Corporation put forth the following priorities to serve Canadians:

- **Customized digital services:** The Corporation aims to ensure that all Canadians are reflected in its digital services, while it connects them to the many communities and voices that make Canada a great country.
- **Engaging with young audiences:** The Corporation strives to become a leader in bringing the best content to children and youth with the goal of enriching their lives and engaging them with their country.

- **Prioritizing its local connections:** The Corporation will strengthen its connection with Canadians with significant local and regional content that is relevant to people in their communities, and bring those communities to the rest of Canada.
- **Reflecting contemporary Canada:** The Corporation will reflect the range and richness of Canada's diversity, celebrating its different perspectives and all the things that bring Canadians together.
- **Taking Canada to the world:** The Corporation will ensure that Canada and Canadian creators are seen and heard the world over.

Full Document

<https://crtc.gc.ca/eng/archive/2019/2019-379.htm>

4. CBC Supplementary Brief at para. 22.

22. CBC/Radio-Canada highly values Canada's independent producers as partners; together we are the engine for the country's creative sector.

Full Document:

https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?AppNo=201902825&_ga=2.88344349.702944990.1594532625-2125534837.1594240961

5. CBC Public Financial Summary, Note 4.

PUBLIC FINANCIAL SUMMARY

AGGREGATE FINANCIAL SUMMARY FOR ALL CBC/RADIO-CANADA SERVICES

This document summarizes the revenue and expenses for all of CBC/Radio-Canada's services.

The Corporation operates broadcasting undertakings pursuant to licences and exemption orders. The traditional broadcasting undertakings consist of conventional television, radio and discretionary services and they operate pursuant to CRTC licences. The Corporation also operates digital services which consist of programming and non-programming services. The digital programming services operate pursuant to the Digital Media Exemption Order. The proportion of the Corporation's revenue and expenses coming from digital services continues to increase over the next licence term. These figures are consistent with the financial projections filed as part of the record of the licence renewal application and do not reflect any changes that may result from the impact on revenue and expenses of the Covid-19 pandemic.

REVENUE		2018-2019	2019-2020	2020-2021	2021-2022	2022-2023 (Note 1)
TOTAL PARLIAMENTARY APPROPRIATIONS (Note 2)		1 215 898 920	1 237 319 627	1 246 785 787	1 260 482 358	1 268 600 671
CONVENTIONAL AND DISCRETIONARY	TV Advertising	216 962 189	214 979 570	213 561 593	212 178 900	210 645 000
	TV Subscriptions	113 698 817	110 448 700	106 787 360	103 464 580	101 080 760
	Syndication/Production revenue	41 137 902	32 468 560	29 449 946	29 477 480	29 477 480
	Other revenue	47 535 329	44 513 517	43 624 348	44 464 523	44 464 523
	TOTAL CONVENTIONAL AND DISCRETIONARY	419 334 237	402 410 347	393 423 247	389 585 483	385 667 763
DIGITAL	Advertising	32 762 726	35 951 757	38 072 689	40 359 952	42 013 969
	Subscriptions	10 752 000	13 200 000	15 950 000	19 275 000	23 323 000
	Syndication/Production revenue	10 254 389	9 255 678	9 073 712	9 088 768	9 088 768
	Other revenue	7 818 177	7 458 246	7 276 093	7 363 000	7 568 000
	TOTAL DIGITAL	61 587 292	65 865 681	70 372 494	76 086 720	81 993 737
TOTAL REVENUE		1 696 820 449	1 705 595 655	1 710 581 528	1 726 154 561	1 736 262 171

OPERATING EXPENSES		2018-2019	2019-2020	2020-2021	2021-2022	2022-2023 (Note 1)
CONVENTIONAL AND DISCRETIONARY	Television	864 002 747	841 394 241	822 377 517	820 312 964	812 630 523
	Specialities (discretionary services)	143 087 854	140 012 277	138 075 953	134 741 717	132 119 901
	TOTAL AUDIO-VISUAL (TELEVISION)	1 007 090 601	981 406 518	960 453 470	955 054 681	944 750 424
	TOTAL AUDIO (RADIO)	290 724 451	293 267 731	295 820 691	298 813 751	302 399 541
	TOTAL CONVENTIONAL AND DISCRETIONARY	1 297 815 052	1 274 674 249	1 256 274 161	1 253 868 432	1 247 149 965
DIGITAL	CBC Gem and ICI TOU.TV (Note 3)	42 948 219	47 558 372	57 201 162	60 286 435	63 653 068
	CBC Listen and OHdio (Note 3)	19 034 570	22 951 086	21 791 883	21 930 262	22 208 386
	Websites, Curio and other (Note 4)	202 947 083	236 378 881	253 755 095	267 348 018	282 137 798
	TOTAL DIGITAL	264 929 872	306 888 339	332 748 140	349 564 715	367 999 252
TOTAL OPERATING EXPENSES		1 562 744 924	1 581 562 588	1 589 022 301	1 603 433 147	1 615 149 217
OTHER EXPENSES (Note 5)		186 549 000	182 925 202	181 725 291	182 018 254	180 112 954
PRE-TAX PROFIT (LOSS) (Note 6)		(52 473 475)	(58 892 135)	(60 166 064)	(59 296 840)	(59 000 000)

Licensed (conventional and discretionary) revenue and expenses are within the scope of our existing broadcasting licences.

Non-Licensed (digital) revenue and expenses are outside the scope of our existing broadcasting licences.

Note 1. 2022-2023 is the last year CRTC requested forecasting to be submitted. Note that the new licence term proposed is until 2024-2025

Note 2. Parliamentary appropriations for conventional, discretionary and digital services.

Note 3. CBC Gem, ICI TOU.TV, CBC Listen and OHdio are programming services that operate pursuant to the Digital media exemption order (DMEQ).

Note 4. Amounts reflect content and production spend projected primarily on CBC.ca/Radio-Canada.ca. These are websites that consist primarily of alphanumeric text and meet the description of a non-programming service.

Note 5. Includes depreciation expense, interest expense and other non-cash expenses related primarily to employee future benefits.

Note 6. CBC/Radio-Canada operates to break-even on a budget basis. The pre-tax loss shown above is due to non-cash expenses estimated for employee future benefit costs, in accordance with International Financial Reporting Standards (IFRS).

Full Document:

https://services.crtc.gc.ca/pub/DocWebBroker/OpenDocument.aspx?AppNo=201902825&_ga=2.88344349.702944990.1594532625-2125534837.1594240961

6. <https://www.cbc.ca/films/faq/> (as of June 24, 2020).

7. <https://www.cbc.ca/mediacentre/press-release/canadas-public-broadcaster-launches-the-cbc-creative-relief-fund> (as of June 24, 2020).

8. **CRTC Decision No. 2005-254 at para. 19.**

19. The Commission is satisfied that the applicant's CTD plan will serve to promote and develop local, regional and national Canadian musical talent, particularly in the genre of instrumental music, which is currently an under-represented genre of music. Of particular note is the applicant's initiative to develop a catalogue of Canadian instrumental music and the associated \$920,000 budget to be spent over seven years. The Commission considers that the proposed catalogue will provide a central source for Canadian instrumental music and artists. The catalogue will also be a valuable research tool for radio licensees considering the introduction or addition of instrumental musical selections to their musical rotations.

Full Document:

<https://crtc.gc.ca/eng/archive/2005/db2005-254.htm>

9. **CBC Supplementary Brief at para. 20.**

20. We are proposing the following commitments:

French Services

- d) **PNI programming** – an expectation of 8 hours per week of PNI programming in total (i.e., total exhibition hours for conventional television and our digital platforms), and a condition of licence setting a minimum of 6 hours per week on the ICI TÉLÉ;
- e) **Children's and youth programming** – a condition of licence of 15 hours of children's programming per week on the ICI TÉLÉ, and an expectation of 110 hours of original children's and youth programming in total (i.e., total exhibition hours for conventional television and our digital platforms), with a condition of licence setting a minimum of eighty 80 hours of original children's and youth programming per broadcast year on the ICI TÉLÉ; and
- f) **Local programming** – an expectation of 5.5 hours per week of local programming in total (i.e., total exhibition hours for conventional television and our digital platforms); and a condition of licence setting a minimum of 5 hours of local programming on the ICI TÉLÉ stations.

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